

November 9, 2017

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *In re Bridging the Digital Divide for Low-Income Consumers*, WC Docket No. 17-287;
Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42;
Telecommunications Carriers Eligible for Universal Service Support, WC Docket No. 09-197

Dear Ms. Dortch:

On November 8, 2017, the undersigned, on behalf of T-Mobile USA, Inc. (“T-Mobile”)¹ spoke via telephone separately with Claude Aiken, Legal Advisor, Wireline to Commissioner Mignon Clyburn; Amy Bender, Legal Advisor, Wireline to Commissioner Michael O’Rielly; Jamie Susskind, Chief of Staff to Commissioner Brendan Carr; and Travis Litman, Chief of Staff and Senior Legal Advisor, Wireline and Public Safety to Commissioner Jessica Rosenworcel. Additionally, on November 9, 2017, the undersigned spoke with Jay Schwarz, Wireline Advisor to Chairman Ajit Pai.

During the calls, T-Mobile urged the Federal Communications Commission (“Commission”) to evaluate ways to better leverage the universal service programs to facilitate connecting low-income consumers with access to affordable voice and broadband services.² To this end, T-Mobile urged the Commission to include questions in the Draft Lifeline Item³ to

¹ T-Mobile USA, Inc. is a wholly-owned subsidiary of T-Mobile US, Inc., a publicly traded company.

² While the Commission requires Connect America Fund Phase II recipients to submit bids to connect schools and libraries in areas where they receive support, *see* 47 C.F.R. § 54.309(b), and also requires all eligible telecommunications carriers to offer Lifeline, *see* 47 C.F.R. § 54.405(a), the Commission does not currently have similar rules to encourage leveraging E-rate and Rural Health Care funding with other programs.

³ *See In re Bridging the Digital Divide for Low-Income Consumers*, Fourth Report and Order, Order on Reconsideration, Memorandum Opinion and Order, Notice of Proposed Rulemaking, and Notice of Inquiry, WC

explore coordination between the E-Rate and Lifeline programs.⁴ For example, the Commission should seek comment allowing schools and libraries to partner with providers to offer Lifeline to low-income students to address the homework gap. T-Mobile noted that breaking down the silos between universal service programs could maximize each dollar of universal service while also helping to achieve the Commission's goal of bridging the digital divide.

Please contact me if you have any questions regarding these matters.

Sincerely,

/s/ Rebekah P. Goodheart

Rebekah P. Goodheart
Counsel for T-Mobile USA, Inc.

cc: Jay Schwarz
Amy Bender
Claude Aiken
Jamie Susskind
Travis Litman

Docket Nos. 17-287 et al., FCC-CIRC1711-05 (Oct. 26, 2017),
http://transition.fcc.gov/Daily_Releases/Daily_Business/2017/db1026/DOC-347452A1.pdf (Draft Lifeline Item).

⁴ Last year, the Commission sought comment on petitions to permit the use of E-rate funding for off-campus use. *See Wireline Competition Bureau Seeks Comment On Petitions Regarding Off-Campus Use Of Existing E-Rate Supported Connectivity*, Public Notice, 31 FCC Rcd 10,510 (2016) ("Public Notice"). T-Mobile filed comments in response to the Petitions. *See* Comments of T-Mobile, CC Docket No. 02-6, WC Docket 10-90, WC Docket No. 13-184 (filed Nov. 3, 2016); Reply Comments of T-Mobile, CC Docket No. 02-6, WC Docket Nos. 10-90, 13-184 (filed Dec. 5, 2016).